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UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
Plaintiff,  
vs.  
JASON KEITH BRUCE,  
Defendant.

Case No.: 2:23-cr-00080-JAM-Z

**STIPULATION REGARDING  
EXCLUDABLE TIME PERIODS  
UNDER SPEEDY TRIAL ACT;  
ORDER**

Date: August 1, 2023  
Time: 9:00 a.m.  
Judge: Hon. John A. Mendez

## STIPULATION

1. By previous order, this matter was set for status on August 1, 2023.
  2. By this stipulation, defendant Jason Bruce now moves to continue the status conference until **October 17, 2023, at 09:00 a.m.**, and to exclude time between August 1, 2023 and October 17, 2023, at 9:00 a.m., under Local Code T4. Defendant Jason Bruce and Defendant Pir Danish Ali were indicted on March 23, 2023. Defendant Ali remains outside the United States and has not yet been arrested or arraigned.
  3. Bruce and the government agree and stipulate, and request that the Court find the following:
    - a) The government has represented that the discovery associated with this case includes approximately 82,841 pages of reports, video and audio recordings, emails, photographs, and other material. In addition, digital device extractions will be produced in discovery and made available for inspection. U.S. Fish and

1 Wildlife Service also has physical evidence available for inspection. Some of  
2 this discovery has already been produced and the remainder will be produced  
3 directly to defense counsel for Bruce this week.

- 4 b) Counsel for the defendant desires additional time to review the discovery,  
5 counsel with his client, conduct investigation and research related to the criminal  
6 charges, and otherwise prepare for trial.  
7 c) Counsel for the defendant believes that failure to grant the above-requested  
8 continuance would deny him the reasonable time necessary for effective  
9 preparation, taking into account the exercise of due diligence.  
10 d) The government does not object to the continuance.  
11 e) Based on the above-stated findings, the ends of justice served by continuing the  
12 case as requested outweigh the interest of the public and the defendant in a trial  
13 within the original date prescribed by the Speedy Trial Act.  
14 f) For the purpose of computing time under the Speedy Trial Act, 18  
15 U.S.C. § 3161, et seq., within which trial must commence, the time period of  
16 August 1, 2023 to October 17, 2023, inclusive, is deemed excludable pursuant  
17 to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a  
18 continuance granted by the Court at defendant's request on the basis of the  
19 Court's finding that the ends of justice served by taking such action outweigh  
20 the best interest of the public and the defendant in a speedy trial.

- 21 4. Nothing in this stipulation and order shall preclude a finding that other provisions  
22 of the Speedy Trial Act dictate that additional time periods are excludable from the  
23 period within which a trial must commence.

24 **IT IS SO STIPULATED.**

25  
26 DATED: July 21, 2023

PHILIP A. TALBERT  
27 United States Attorney

/s/ KATHERINE T. LYDON  
KATHERINE T. LYDON  
Assistant U.S. Attorney

DATE: July 21, 2023

/s/ Thomas A. Johnson  
THOMAS A. JOHNSON  
Attorney for Jason Bruce

## ORDER

## **IT IS SO FOUND AND ORDERED.**

Dated: July 24, 2023

/s/ John A. Mendez  
THE HONORABLE JOHN A. MENDEZ  
SENIOR UNITED STATES DISTRICT JUDGE